IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA **CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEMS PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL 2327

ETHICON WAVE 12 CASES LISTED IN EXHIBIT A

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF TERRI LONGACRE, M.D. FOR WAVE 12

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed against Terri Longacre for Ethicon Wave 1, Dkt. 2076 (motion), Dkt. 2098 (memorandum in support) and Dkt. 2253 (reply). Plaintiffs respectfully request that the Court exclude Terri Longacre's testimony, for the reasons expressed in the Wave 1 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019 Respectfully submitted,

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EXHIBIT A

Bloom, Lynne 2:17-cv-01960 Britt, Judy 2:13-cv-01947 Burke, Lora 2:15-cv-12902 Cloutier, Deborah 2:15-cv-11930 Cooper, Janis M. 2:12-cv-06593
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Cooper, Janis M. 2:12-cv-06593
Crow, Natalie 2:14-cv-12908
Daugherty, Marie 2:13-cv-01325
Dealba, Circe 2:13-cv-19143
Enborg, Terri 2:13-cv-18734
Epstein-Clark, Linda 2:14-cv-14081
Freeman, Terri 2:13-cv-24578
Greenwell, Shirley 2:13-cv-20166
Gurrola, Klaudia 2:13-cv-04826
Hagler, Penney 2:13-cv-19177
Henderson, Karan 2:14-cv-18418
Hervey, Susan, Personal Representative of
Estate of Georgia Hervey, deceased 2:12-cv-05839
Kole, Kim 2:18-cv-00291
Lambert, Evelyn 2:13-cv-04824
Marston, Susan 2:12-cv-09490
McBroom, Amanda 2:15-cv-03043
Nelson, Linda 2:12-cv-08135
Pelham, Sandra J. 2:13-cv-08384
Price, Renie 2:16-cv-12548
Reyna, Kathy 2:14-cv-14089
Smith, Barbara D. 2:13-cv-20902
Smith, Tabitha 2:13-cv-21957
Solano, Josie 2:14-cv-14101
Townsend, Tamara J. 2:13-cv-26725
Tucker, Dawn 2:16-cv-09071
Valencia, Jasmine 2:12-cv-05475
Vargas, Belinda 2:13-cv-15722
Vigil, Hortencia 2:14-cv-01060
Webb, Kelly J. 2:13-cv-03083
Zyph, Cleo 2:16-cv-12024

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ D. Renee Baggett
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4